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December 8, 2020

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VIA ECF

Hon. Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Angeles v. Reckitt Benckiser LLC, et al.*, Case No. 1:20-cv-7138 (RA)(BCM)

Dear Judge Abrams:

We represent Defendants Reckitt Benckiser LLC and RB Health (US) LLC (“Defendants”) in the above-captioned case, and respectfully submit this letter, pursuant to Your Honor’s Individual Practice 1(D), to request an adjournment of (i) the December 15, 2020 deadline for Defendants to answer or otherwise respond to the Complaint and (ii) the initial status conference currently scheduled for December 18, 2020, at 3:00 p.m.

The parties recently have engaged in settlement discussions regarding the potential resolution of the present matter and related disputes, involving the same defendants and counsel, presently pending in the U.S. District Courts for the Eastern District of California (*Matthews v. Reckitt Benckiser LLC, et al.*, No. 1:20-cv-00854) and Southern District of Florida (*Williams et al. v. Reckitt Benckiser LLC, et al.*, No. 1:20-cv-23564); however, those efforts have not been fruitful. Accordingly, Defendants anticipate filing a motion to stay or transfer the present action in deference to the first-filed action pending in the U.S. District Court for the Eastern District of California.

In accordance with the proposed Revised Scheduling Order filed with the present letter motion, Defendants respectfully request that the Court order the following briefing schedule on Defendants’ anticipated motion to transfer: (i) Defendants shall file any motion to transfer on or before January 15, 2021; (ii) Plaintiff Maritza Angeles (“Plaintiff”) shall file any opposition to the motion to transfer on or before January 29, 2021; and (iii) Defendants shall file any reply in further support of the motion to transfer on or before February 5, 2021. Defendants further request that the December 15, 2020 deadline for Defendants to respond to the Complaint and the December 18, 2020 initial status conference be adjourned pending resolution of Defendants’ anticipated motion to stay or transfer the present action.

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Counsel for Plaintiff consents to the present request, which constitutes the second request for an adjournment or extension of time in the above-captioned matter.¹

We thank Your Honor for your attention to this matter.


Respectfully submitted,

/s/ Adam H. Schuman
Adam H. Schuman

cc: All parties via ECF

Application granted.

SO ORDERED.



Hon. Ronnie Abrams
December 9, 2020

¹ On October 15, 2020, this Court granted Defendants' request to adjourn the initial status conference and Defendants' deadline to respond to the Complaint. (ECF No. 16).